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Luke Stang*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

JOSH MYERS, as Parent and Legal  
Guardian on behalf of EKS, a minor child,

Plaintiff,

vs.

NYE COUNTY, a County of State of  
Nevada; DEPARTMENT OF PUBLIC  
SAFETY, DIVISION OF NEVADA  
HIGHWAY PATROL, a political  
subdivision of the STATE OF NEVADA;  
NYE COUNTY DEPUTY BREANNA  
NELSON; NYE COUNTY LIEUTENANT  
ALAN W. SCHRIMP; NYE COUNTY  
DETECTIVE BROOKE GENTRY; NYE  
COUNTY DEPUTY MICHAEL MOKESKI;  
NYE COUNTY TRAINEE ISAAC  
CHAMPLIN; NYE COUNTY DETECTIVE  
DANIEL FISCHER; NEVADA HIGHWAY  
PATROL TROOPER LUKE STANG; DOE  
OFFICERS, AGENTS, or the like I through  
X, Inclusive; and ROE CORPORATIONS I  
through X, inclusive, ROE AGENCIES OR  
POLITICAL SUBDIVISIONS I-X

Defendants.

Case No.: ~~2:23-cv-00398-EPB-EJY~~  
2:23-cv-00478-CDS-EJY

**JOINT STIPULATION TO EXTEND  
RESPONSE DEADLINES  
(Second Request)**

Plaintiff Josh Myers, as Parent and Legal Guardian on behalf of EKS, a minor child,  
by and through counsel, Boyd B. Moss III, Esq., and Defendants Daniel Fischer, Isaac  
Champlin, Brooke Gentry, Alan W. Shrimpf, Breanna Nelson, Michael Mokeski, Luke

Stang, Department of Public Safety, Division of Nevada Highway Patrol, and Nye County, by and through their respective counsels, have conferred and hereby stipulate to extend Defendants' deadline to respond to Plaintiff's Complaint for an additional sixty (60) days.

The parties submit there is good cause for the extension. Plaintiff seeks consolidation of this matter with the related action *Roberts v. Nye County, et al.*, Case No. 2:22-cv-00398-RFB-EJY. To address various issues related to the possible consolidation of this matter, including how consolidation may impact the status of the pending defense motions in the *Roberts* case, the parties conferred by phone and later submitted a stipulation to set a pretrial conference on June 26, 2023. However, as of the date of this filing the *Roberts* court has not ruled on either the pretrial conference request or the pending defense motions. Accordingly, the parties hereby agree to extend the deadline for Defendants to respond to Plaintiff's Complaint for an additional sixty (60) days, with responsive pleadings due no later than October 23, 2023.

**IT IS SO STIPULATED.**

DATED this 23rd day of August 2023.

DATED this 22nd day of August 2023.

/s/Boyd B. Moss

Boyd B. Moss III, Esq.

Marcus A. Berg, Esq.

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*Attorneys for Defendants Breanna Nelson, Alan W. Schrimpf, Brooke Gentry, Michael Mokeski, Isaac Champlin, and Daniel Fischer*

DATED this 22nd day of August 2023.

DATED this 22nd day of August 2023.

/s/Stephanie Bedker

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Highway Patrol, and Luke Stang*

**ORDER**

**IT IS SO ORDERED.** The deadline for Defendants Daniel Fischer, Isaac Champlin, Brooke Gentry, Alan W. Shrimpf, Breanna Nelson, Luke Stang, Department of Public Safety, Division of Nevada Highway Patrol, Michael Mokeski, and Nye County to respond to Plaintiff's Complaint is extended for an additional sixty (60) days up to and including October 23, 2023.

DATED: August 24, 2023

  
UNITED STATES MAGISTRATE JUDGE